

Mr. Greg Bontrager
Cellofoam North America, Inc.
P.O. Box 406
Conyers, Georgia

Re: AA081-13568-00017
First Administrative Amendment to
FESOP 081-10968-00017

Dear Mr. Bontrager:

Cellofoam North America, Inc. located at 150 Crossroads Drive, Whiteland, Indiana 46184 was issued a permit on April 4, 2000 for a stationary expanded polystyrene insulation board manufacturing plant. A letter requesting the replacement of the existing permitted one (1) 16' 24" thick tube mold and one (1) 18' 25" thick tri mold into one (1) 18' adjustable length and compression feature 36" thick mold, Model # HT48-216/144-36 was received on December 4, 2000. The FESOP change involves incorporating a modification that will replace a part or piece of equipment in an existing process line. The replacement mold will not result in a new potential to emit, since the maximum polystyrene beads usage rate stays the same at 841 pounds per hour. Pursuant to the provisions of 326 IAC 2-8-10(a)(13) the permit is hereby administratively amended as follows (changes are bolded and deletions are struck-through for emphasis):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

One (1) line producing expanded polystyrene rigid board insulation, known as Line 1, installed in 1991, modified in 1994, exhausted to general ventilation capacity: 841 pounds of polystyrene beads per hour, consisting of the following equipment:

- (a) Two (2) steam expanders,
- (b) One (1) latex adhesive lamination roll coater, capacity: 7,000 square feet per hour,
- (c) ~~Two (2) molds~~ **One (1) 18' adjustable length and compression feature 36" thick mold, Model # HT48-216/144-36,**
- (d) Eight (8) hot wire cutters,
- (e) One (1) storage area for intermediate and final products; and
- (f) One (1) band saw.

This change was also reflected on Section D.1 description table, Page 24 of 34 of the FESOP.

All conditions of the permit shall remain unchanged and in effect. Please attach a copy of this

Cellofoam North America, Inc.
Whiteland, Indiana
Reviewer: Aida De Guzman

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amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman at (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

APD

cc: File - Johnson County
U.S. EPA, Region V
Johnson County Health Department
Air Compliance Section Inspector - Marc Goldman
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR MANAGEMENT**

**Cellofoam North America, Inc.
150 Crossroads Drive
Whiteland, Indiana 46184**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 081-10968-00017	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: April 4, 2000
1 st Administrative Amendment 081-13568-00017	Pages affected: 4, 24
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary expanded polystyrene insulation board manufacturing plant.

Authorized Individual: Greg Bontrager
Source Address: 150 Crossroads Drive, Whiteland, Indiana 46184
Mailing Address: P.O. Box 406, Conyers, Georgia 30207
Phone Number: 770 - 929 - 3688
SIC Code: 3089
County Location: Johnson
County Status: Attainment for all criteria pollutants
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD;
Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

One (1) line producing expanded polystyrene rigid board insulation, known as Line 1, installed in 1991, modified in 1994, exhausted to general ventilation capacity: 841 pounds of polystyrene beads per hour, consisting of the following equipment:

- (a) Two (2) steam expanders,
- (b) One (1) latex adhesive lamination roll coater, capacity: 7,000 square feet per hour,
- (c) One (1) 18' adjustable length and compression feature 36" thick mold, Model # HT48-216/144-36,
- (d) Eight (8) hot wire cutters,
- (e) One (1) storage area for intermediate and final products; and
- (f) One (1) band saw.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour. (326 IAC 6-2-4)
- (b) Water based adhesives that are less than or equal to 5 percent by volume of VOCs excluding

HAPs.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

One (1) line producing expanded polystyrene rigid board insulation, known as Line 1, installed in 1991, modified in 1994, exhausted to general ventilation capacity: 841 pounds of polystyrene beads per hour, consisting of the following equipment:

- (a) Two (2) steam expanders,
- (b) One (1) latex adhesive lamination roll coater, capacity: 7,000 square feet per hour,
- (c) One (1) 18' adjustable length and compression feature 36" thick mold, Model # HT48-216/144-36,
- (d) Eight (8) hot wire cutters,
- (e) One (1) storage area for intermediate and final products; and
- (f) One (1) band saw.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-5(1)]

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The requirement from CP 081-1987-00017, issued June 24, 1991, Condition 5 requiring a 1,624 tons per year polystyrene bead throughput limit is not applicable because CP 081-3548-00017 issued June 10, 1994 supercedes that permit. CP 081-3548-00017 did not incorporate a throughput limit. Based on the proposed limit submitted in the application for CP 081-3548-00017 and the current review BACT is:

- (a) The pentane content of the polystyrene beads shall not exceed five percent (5%) by weight and that the lowest pentane content material will be used as it becomes available on the market, and
- (b) That the input of polystyrene beads to the production line shall be limited to 3,150 tons per year, based on a twelve (12) month rolling average equivalent to 94.5 tons of VOC per year assuming a 5% pentane content.

D.1.2 VOC and HAP Limits [326 IAC 2-8]

- (a) The throughput of polystyrene beads shall be limited to less than 2,723 tons per twelve (12) consecutive month period and the pentane content of the beads shall not exceed five percent (5.0%) by weight. This is equivalent to VOC emissions of 81.7 tons per twelve (12) consecutive month period.
- (b) Individual HAP input delivered to the latex adhesive lamination roll coater shall not exceed a total of ten (10) tons per twelve (12) consecutive month period rolled on a monthly basis. The combination of HAPs shall not exceed a total of twenty-five (25) tons per twelve (12) consecutive month period rolled on a monthly basis. Therefore, the requirements of 326 IAC 2-7 do not apply.

Cellofoam North America, Inc.
Whiteland, Indiana
Permit Reviewer:PMM/MES

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Amended by: Aida De Guzman

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